

From: amy@northlandorganic.com

Sent: Friday, September 22, 2006 11:31 AM

To: Frances, Valerie

Subject: FW: Comment regarding Point of Clarification on Final Recommendation for Lecithin Bleached

Attachments: ATTACHMENT.TXT; NOSB Bleached Lecithin.jpg

From: Amy Nankivil

Sent: Thursday, September 21, 2006 5:27 PM

To: 'NOSB.Processing@usda.gov'

Subject: Comment regarding Point of Clarification on Final Recommendation for Lecithin Bleached

Dear Handling Committee,

I recently came across your August 25th "Point of Clarification on the Final Recommendation for Lecithin - Bleached document" (see attachment).

While I appreciate the fact that you have acknowledged Northland's comment regarding the committee's recommendation to remove bleached lecithin from the National List was not appropriately addressed during its evaluation of this material, I am again disappointed that we were neither informed of your most recent investigation of the issue nor asked for names of organic manufacturers who will suffer from this decision.

In addition, as was pointed out in my letter to the committee dated May 12, 2006 "[there were at least 18 other comments sent strongly in support of keeping bleached lecithin on the list and only one or two \(Clarkson and OCA, I believe\) that recommend removing it from the list. There were also at least 35 letters supporting the list as published which means that they also support keeping bleached lecithin on the NOP list.](#)" My point is, I guess, that mine was not the only comment that was overlooked when the recommendation was made. I will put together a list of everyone who sent comments and send it to you tomorrow as I am wondering if these companies have been contacted for their input as to the damage that would result from removing bleached lecithin from the list.

Please consider that the use of bleached Lecithin in its dry form (which is not commercially available as certified organic) is used by many food manufacturers for many applications where a fluid form will obviously not work (due to the high oil content in fluid lecithin, the color, the odor, the consistency, and the functionality, including the phospholipid content). In addition, there are organic cosmetic manufacturers who can not use fluid lecithin for many of their products.

Keep in mind that March 13, 2006, The Handling Committee's Final Recommendation for 205.606 was to renew Lecithin-unbleached because, at that meeting, a manufacturer of unbleached organic lecithin admitted that there are over "165 standardized versions of conventional lecithin. For the moment, the organic world certifies only two or three standardized formulations," and "Dry granular organic lecithin is probably a year from introduction." Therefore, the handling committee agreed "based on compelling evidence given by a manufacturer of organic lecithin - unbleached, that every use of lecithin - unbleached cannot be adequately filled by the organic forms that are currently available."

It makes no sense at all that unbleached fluid lecithin was left on the list because the organic counterpart doesn't meet all applications, yet the same organic fluid product (that is only different because it has been bleached) is supposed to work for all of the applications that the unbleached doesn't work for. If there is a bleached form of organic powdered lecithin that I am not aware of, please let me know. I have many customers who are desperate to find out what they are supposed to do if bleached powdered lecithin is removed from the list, and it can often take a food manufacturer many months to incorporate a new ingredient. If you have a secure organic source for them, I would appreciate knowing what it is and who they can source it from.

I know that there is a comment period before the October NOSB meeting. Please let me know if I must submit these comments in a formal letter to Valerie Frances in order for to be considered at the NOSB meeting next month.

I appreciate your consideration.

Amy Nankivil

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